

February 10, 2023

Via Website Submission

U.S. Environmental Protection Agency
EPA Region 6 Main Office
1201 Elm Street, Suite 500
Dallas, TX 75270
Telephone: +1 (214) 665-2760

Re: Candy Gilbert v. Huntsman Incorporated, et al.
Case No.: A-210009 (Jefferson County, TX)
TRI FACILITY ID: Port Neches Facility (TRI Facility ID: 77651TXCCHHWY36)
Facility Address: 6001 FM, Port Neches, Texas 77651

To whom it may concern:

Our law firm, Romanucci & Blandin, LLC, represents Cindy Gilbert, regarding a potential claim stemming from Ms. Gilbert's breast cancer diagnosis after living next to a chemical facility in Port Neches, Texas for many years (TRI Facility ID: 77651TXCCHHWY36). Upon information and belief, ethylene oxide emissions from this facility were a cause in the development of breast cancer.

Pursuant to the provisions of the Freedom of Information Act, 5 U.S.C. § 552, I am requesting information related to any and all documentation of the above-referenced incident, which would include, but not be limited to;

- Any and all documents; incident reports; supplemental reports; permits; permit violations; City of Port Neches, TX reports; physical evidence; photographs; audio records; audio transcripts; video recordings; witness statements; memos; reports; risk-assessments; emission modeling; and any and all disciplinary actions taken against any corporate representatives and/or employees, both current or prior; internal and external email correspondences regarding personnel records;
- All correspondence (defined as letters, faxes, emails, instant messages, direct messages, hand-written notes, or any other means of written and/or typed communication) between (1) the U.S. Environmental Protection Agency and/or its personnel, agents, employees, and/or contractors **and** (2) Huntsman Petrochemical LLC or Indorama or Indorama Ventures or any other company owning and/or operating the Port Neches Facility (TRI Facility ID: 77651TXCCHHWY36) executives, personnel, agents, employees, and/or contractors from August 21, 2018 until the date of this letter.
- All correspondence (defined as letters, faxes, emails, instant messages, direct messages, hand-written notes, or any other means of written and/or typed communication) between (1) the U.S. Environmental Protection Agency and/or its personnel, agents, employees, and/or contractors and (2) any individual, group, partnership, limited liability entities, limited liability associations, trade groups, trade associations, corporations, companies, or any other entity from August 21, 2018 until the date of this letter regarding Huntsman Petrochemical LLC or Indorama or Indorama Ventures or any other company owning and/or operating the Port Neches Facility (TRI Facility ID: 77651TXCCHHWY36). This includes but is not limited to that facilities' emissions, technology,

equipment, employees, safety, operations, personnel, compliance, ethylene oxide, and ethylene glycol.

At this time, I am also requesting a waiver of all fees for this request. Disclosure of the requested information is in the public's interest and is likely to contribute significantly to public understanding of the studies, regulations, and standards of the federal government and its corresponding agencies (i.e. USEPA, ATSDR, etc.) regarding the Facility ethylene oxide emissions. Our request is not a commercial interest. Ms. Gilbert is one of many Texas residents who has been exposed to ethylene oxide emissions from this facility for years and now suffers from cancer. She seeks this information for the well-being of herself, her family, and the rest of the community.

If any of the above-referenced materials are privileged or non-disclosable, please identify them accordingly. Such privilege or disclosure limitations on individual documents should not and will not be construed to apply to the foregoing request as a whole. Further, our office is amenable to receiving these documents on a rolling basis as they become available. Should you have any questions regarding methods of disclosure, please contact me at the direct line above.

I trust that you will give this matter your prompt attention. Please contact me if you need further information. Thank you in advance for your cooperation.

Sincerely yours,

ROMANUCCI & BLANDIN, LLC

/s/ *Bryce T. Hensley*

Bryce T. Hensley

Senior Attorney

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